

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN R.S. DOE,

Plaintiff,

vs.

Case No: 21-cv-12500
Hon. Denise Page Hood
Mag. Kimberly G. Altman

THE UNIVERSITY OF MICHIGAN,

and

**THE REGENTS OF THE
UNIVERSITY OF MICHIGAN** (official
capacity only);

Defendants.

DEBORAH GORDON LAW

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**PROTECTIVE ORDER CONCERNING THE USE OF PSEUDONYM
JOHN R.S. DOE**

In order to protect the interests of Plaintiff John R.S. Doe in this action, IT IS
ORDERED THAT:

1. Plaintiff shall proceed in this action under the pseudonym John R.S. Doe.

2. All documents filed with the Court that contain the name of Plaintiff or information that identifies Plaintiff or his family members, directly or indirectly, shall be filed under seal. In all publicly filed documents, Plaintiff shall be identified only by his pseudonym.

3. The identity of Plaintiff may be disclosed only to the extent reasonably necessary for the conduct of this action and only to the following:

- a. The Court (including any appellate court) and Court personnel;
- b. Court reporters in connection with the taking of a deposition or the transcription of court proceedings;
- c. Attorneys for the parties to this action who are involved in this action and such attorneys' employees who are involved in this action;
- d. Parties to this action and their officers, directors, and trustees;
- e. Experts, advisors, consultants, and other persons engaged to directly assist in this action; and
- f. Mediators, facilitators, arbitrators, or other third-party neutrals that are engaged by the parties to this action to participating in a resolution of this action.

4. Individuals to whom disclosure of Plaintiff's identity is made shall not further disclose that information to any other person.

5. Any person to whom disclosure of Plaintiff's identity is made shall first read this Protective Order prior to having access to Plaintiff's identity. Defendants'

counsel shall ensure that all persons to whom disclosure is made pursuant to paragraph 3 of this Protective Order have received and read the Protective Order.

6. Under no circumstances shall any person disclose Plaintiff's name to the media without the consent of Plaintiff's counsel.

7. If any specific issues related to the non-disclosure of Plaintiff's identity arise during the course of this action, the parties shall seek to resolve those issues without court intervention. If the parties cannot agree, they shall seek further clarification from this Court.

IT IS SO ORDERED.

Dated:

Hon. Denise Page Hood
United States District Court Judge